

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)
	)
<b>Amendment of Part 97 of the Commission's Rules</b>	) <b>WT Docket No. 05-235</b>
<b>To Implement WRC-03 Regulations Applicable to</b>	)
<b>Requirements for Operator Licenses in the</b>	) <b>RM-10781, RM-10782, RM-10783</b>
<b>Amateur Radio Service</b>	) <b>RM-10784, RM-10785, RM-10786</b>
	) <b>RM-10787, RM-10808, RM-10809</b>
	) <b>RM-10810, RM-10811, RM-10867</b>
	) <b>RM-10868, RM-10869, RM-10870</b>

**To: The Commission,**

**OPPOSITION TO PETITION OF MR. ANTHONY R. GORDON'S  
FOR PARTIAL RECONSIDERATION**

Mr. Anthony **R.** Gordon has petitioned the Commission to reconsider and modify a portion of the ***Report and Order*** (the ***R&O***), FCC 06-178 released on January 24, 2007, 72 Fed. Reg. 66460 et seq. It is Mr. Gordon's contention that an unintended consequence of the R&O, in totally removing the requirement for an Amateur Radio Operator to show proficiency sending and receiving messages in Morse Code, poses serious National Security implications. Mr. Gordon fails in his logic to show exactly what those "serious National Security implications" are, and quoting pieces of other documents without a full showing of exactly what that document is intended to convey does not show service to the justification for "serious National Security implications". Many people attempt to justify every small concern as having serious a "National Security Implication" and fail in the attempt. Mr. Gordon's contentions are another similar example.

### **Paragraph 1 – Introduction of Mr. Gordon’s Petition for Re-consideration**

Mr. Gordon contends that “...failure to keep the Morse Code telegraphy requirement intact, at least as a required examination element for the Amateur Extra Class operator license, fails to take into consideration the significant national security implications that require retaining adequate examination safeguards to insure the future viability that Morse Code telegraphy provides, not only to the Amateur Radio Service, but the nation as well”, and the accompanying footnote 4.

If an Amateur Radio licensee desires to learn Morse code, they are free to do that and practice to their heart’s content on the assigned frequencies allocated in the High Frequency (HF) and Very High Frequency (VHF) band plans. Nowhere in the subject R&O is Morse code forbidden to be used. If, ~~as~~ Mr. Gordon speculates, that Morse code is so necessary for National Security reasons, why did Department of Defense (DoD) and Department of Homeland Security (DHS) fail to intercede on behalf of retaining the Morse code requirement? Had either, or both, of these Executive Branch Departments interceded based on National Security reasons, Morse code would have been required for both the General and Extra Class of licenses. To say that Morse code is required for so small a band of additional frequencies that the Amateur Extra Class license conveys to the individual does not stand-up to intellectual scrutiny.

### **II. National Security “Unity of Effort” Requires Keeping the “Core Competency” of Morse code as an Examination Element for the Amateur Extra Class Operator License.**

Mr. Gordon references “Joint Publication 0-2, Joint Chiefs of Staff, entitled *Unified Action Armed Forces (UNAAF)* which provides the basic doctrine and policy governing the unified direction of forces in joint warfare and discusses the functions of

the Department of Defense and its major components.” Nowhere in Mr. Gordon’s recitation of Joint Publication 0-2 does he mention how this document affects Amateur Radio Operators or the ‘perceived need’ for Morse code in developing basic doctrine and policy governing the unified direction of forces in joint warfare.

Further investigation of the Joint Doctrine Publications Hierarchy<sup>[1] through [12]</sup> (see Appendix A – Endnotes) fails to show any application to the Amateur Radio Service or Amateur Radio Operators. Joint Publication 0-2<sup>[2]</sup> is one of two overarching documents for the Joint Doctrine for War Fighting. Additional, subordinate Joint Publications address: Personnel (JP 1-0)<sup>[3]</sup>, Intelligence (JP 2-0)<sup>[4]</sup>, Operations (JP 3-0)<sup>[5]</sup>, Logistics (JP 4-0)<sup>[6]</sup>, Plans (JP 5-0)<sup>[7]</sup>, and C4 Systems (JP 6-0)<sup>[8]</sup>. (JP 3-0 is further subdivided in 47 additional publications. Four of these documents are relevant to this discussion; JP-3-08, ‘Interagency Coordination’<sup>[9]</sup>; JP 3-28, ‘Civil Support’<sup>[10]</sup>; JP 3-29, ‘Humanitarian Operations’<sup>[11]</sup>; and JP 3-57 ‘Civil-Military Operations’<sup>[12]</sup>) During a word search of the JP 1-0 through JP 6-0 documents for various words, or combination of words, associated with Amateur Radio, Amateur Radio Operator, Radio Operator, and FCC, no reference to any of these words or groups of word were found.

The Department of Defense is forbidden to operate, as a police force, within the Continental United States under the Posse Comitatus Act of 1878 (18 U.S.C. § 1385)<sup>[13]</sup>. The proper authorities for handling Terrorist Activities within the Continental United States and its Territories are the local police and when terrorist acts cross state-line, the Department of Justice (Federal Bureau of Investigation (FBI) and the United States Attorney for those districts) have jurisdiction.

Does Mr. Gordon envision that the U.S Military would federalize the amateur radio operators, drafting them into uniform and ‘under arms’, to help in the War on Terrorism? Does Mr. Gordon expect to see scenarios, such as those depicted in the Science Fiction movie ‘Independence Day’ where, in addition to digging out relic Morse code keys and setting up a bank of telegraphers to effect a global communications network, the Air Force recruits a Crop Duster with Post Traumatic Stress Disorder (acute Alcoholism) to pilot a high performance jet fighter (F-16) when the last jet he had flown as a F-4, twenty to thirty years before? I venture that this would be an **extremely remote possibility**.

In searching the Department of Homeland Security website for guidance documents, there were six (6) courses<sup>[14] through [19]</sup> for National, State, Local, and Tribal Emergency Managers, Senior Staff, and Responders to learn about the National Incidence Management System. In reviewing all of these courses, Communications was at the fourth level down from the Incident Commander. The Communications Unit Leader is responsible for developing the communication staffing to support all the unit action teams and the Incident Command through the Logistics Section Chief. No specific mention is made of using Radio Amateurs or the mandatory use of Morse code to transmit/receive messages between the various levels from the Incident Command center to the Federal, State, Local or Tribal authorities.

### **Paragraph 3 – Amateur Radio Service and “Core Competencies”**

Mr. Gordon asserts that “...one of its main “core competencies” has been the pool of talented Morse code telegraphy operators at the Amateur Extra Class operator level, a ‘core competency’ of the Amateur Radio Service that will no doubt be effected by the

failure of the Commission to require testing in this critical skill for the required ‘unity of effort’ in emergency decision making and war fighting, especially in the current War on Terrorism.”

While the portion of the above statement commenting on the pool of Morse code telegraphy operators’ make-up changing, is certainly true as Technician Class License operators test for and are granted General and Extra Class licenses, there will be other operators with Technician Plus, General and Advance Class licenses (which currently have Morse code experience) who will test for and be granted the Extra Class license, also. How the pool of Extra Class licensees will change is an unanswered question for the foreseeable future.

The term “core competency” also needs to be addressed and understood in context. As Amateur Radio operators we can only communicate if there is a sender, a receiver, and an agreed to medium. The accepted definition of “core competency” comes from its creators, Gary Hamel and C.K. Prahalad<sup>[20]</sup> in a 1990 Harvard Business Review article. Their definition paraphrased, is that a core competency is something that a firm can do well and that meets the following three conditions:

- It provides customer benefits
- It is hard for competitors to imitate
- It can be leveraged widely to many products and markets.

This author asserts that Morse code proficiency is not a core competency of the Amateur Radio Service by the definition provided. The Service as a whole does not do Morse code well - it is a specialized practice of a decreasing segment of the Service

population. Until that statement is logically and convincingly refuted, the qualifying conditions cannot be argued.

Code proficiency is an elemental practice that the Amateur Service was built on; but it is no longer a core competency of the Service. I assert the Service's core competencies are in forming ad hoc communications links and networks that operate under adverse or even unlikely conditions and in creating and developing the technologies to achieve those links.

With regards to the second part of Mr. Gordon's statement concerning "unity of effort in emergency decision making and war fighting", in the course of my readings and participation in training; courses in Emergency Communications (including Federal Emergency Management Agency (FEMA), Department of Homeland Security (**DHS**) and ARRL courses on Emergency Communications) no mention has been made or asserted to, has the Amateur Radio Operator been a member (much less a key member) of the emergency decision making process. I do not believe that any Army, Air Force, Navy or Marine Corp radio operator (equivalent to an Amateur Radio operator) has had an input into war fighting decision making, beyond sending and receiving messages). Amateur Radio Operators are always utilized in a support role, several levels below the key decision makers. This whole line of Mr. Gordon's reasoning does not stand intellectual scrutiny.

**III. The Morse Code Examination Element for the Amateur Extra Class Operator License should be kept in the Public and National Security Interest as a Hedge against Future Threats in the War Against Terrorism, as well as for Future Emergency Communications Requirements.**

Mr. Gordon's analogies and comparisons to the Combat Operations in Afghanistan and Iraq have absolutely no bearing on the requirement for an Amateur

Radio Operator to be able to send and receive Morse code at five words per minute (5wpm). While it may be true that current demands for operational awareness on the battle field require high bandwidth (video, voice, and data) and these high bandwidth channels may have saturated the available bandwidth of current Satellites or number of Satellites, this has absolutely no bearing on requiring the testing of applicants for the Amateur Extra Class of operator license. The low bandwidth communications provided by a Radio Operator using Morse code on the HF, VHF or UHF bands provides negligible or no value to effect the effort. This whole line of reasoning does not stand intellectual scrutiny.

As for future Emergency Communication requirements, Mr. Gordon fails to identify any events which might happen. Again, I refer to the scene in the Science Fiction movie, 'Independence Day' where the Military communications center makes contact with Multi-National Forces, in hiding, around the world using Morse Code to plan and coordinate an attack on multiple Alien Space Craft.

Mr. Gordon is grasping at straws to maintain a requirement that has been supplanted, just as the horse and buggy were supplanted by the automobile. The decision to eliminate the Morse code requirement has been given thoughtful deliberation on the part of the Commission with input from the Amateur community. If the Commission were to reopen this issue, it would set precedence to re-open other Reports & Orders' for "National Security implications". I do not believe the Commission would want to open this "Pandora's **Box**".

#### **IV. The Morse code Examination Element for the Amateur Extra Class Operator License should be kept as a “Strategic Reserve” in the Public and National Security Interests for Future Emergency Communication Requirements.**

Mr. Gordon again uses analogies and examples of war fighting scenarios which have no supporting relevance to the supposition that Morse code is required for Public and National Security Interests. Every technology has limitations which can render that technology useless. Radio communications are susceptible to problems associated with Solar and Geomagnetic events which can totally shut down communications across the street or around the world. Radio communications can be jammed just as easily as any other form of communications (again, see scenes from the Science Fiction movie ‘Independence Day’). ‘When these events happen, there is no amount of Morse code that will penetrate the supercharged atmosphere or break through the jamming to complete a communications link. The FCC Enforcement Bureau has ample evidence of harmful interference to repeaters and operator’s base and mobile stations caused by faulty power lines, electrified fencing, doorbells, etc., and deliberate jamming of repeaters or operators engaged in long distance contacts.

Mr. Gordon makes reference to a “Strategic Reserve for the Public and National Security interests”. In searching for definition of a Strategic Reserve, the only reference, I could find was to the National Strategic Petroleum Reserve and the definition put forth by General Carl Von Clausewitz<sup>[21]</sup>, On-War, Book 111 – Of Strategy in General, Chapter 13 titled Strategic Reserve. “... But the point where the idea of a strategic reserve begins to become inconsistent is not difficult to determine: it lies in the *supreme decision*. Employment must be given to all the forces within the space of the supreme decision, and every reserve (active force available) which is only intended for use after that decision is



opposed to common sense.” To envision that Radio Amateurs would form a strategic reserve for the Armed Forces to use in a major conflict is for want of a better term “stretching the limits of imagination”.

Strategic Reserve, as a term is not found in either of the **Dictionaries**<sup>[22],[23]</sup> that I had access to. However, each word is and had multiple definitions. In reviewing the word ‘Strategic’, the three possible meanings were: “(1) Of or pertaining to strategy; useful or important with regard to strategy. *Also gen.*, concerned with or involving careful planning towards an advantage: *loosely*, important, (2) **Of** or pertaining to or designating (nuclear) weapons, aircraft, or bombing intended to destroy the economic and industrial installations, communications facilities etc., of an enemy country, (3) (of a material, an installation, a facility) essential to a country for fighting a war; of or pertaining to such material, etc.”<sup>[22]</sup>. I fail to see a connection between any of these three meanings of the word ‘Strategic’ and Amateur Radio, which is a HOBBY.

Further investigation of the word ‘Reserve’ found 17 possible definitions<sup>[23]</sup>: “(1) to keep back or save for future use, disposal, treatment, etc., (2) to retain or secure by express stipulation, (3) to set apart for a particular use, purpose, service, etc., (4) to keep for oneself, (5) to retain (the original color) of a surface, *as a painted ceramic piece*, (6) to save or set aside (a part of the Eucharistic elements) to be administered, as to the sick, outside of Mass or Communion service, (7) Finance (a) cash or assets readily convertible into cash, held aside as by a corporation, bank, state, or national government, etc., to meet expected or unexpected requirements, ..., (8) something kept or stored for use or need; stock; a reserve of food, (9) a resource not normally called upon but available, if needed, (10) a tract of public land set apart for special purpose: a forest reserve, (11) an act of

reserving reservation, exception, or qualification: I will do what you ask, but with one reserve, (12) *mil.* (a) a fraction of a military force held in readiness to sustain the attack or defense made by the rest of the force (b) a part of a country's fighting force not in active service, (c) reserves, the enrolled but not regular components of the US Army, (13) formality or self restraint in manner and relationship; avoidance of familiarity or intimacy with others: to conduct oneself with reserve, (14) reticence or silence, (15) in reserve, put aside or withheld for a future need; reserved: money in reserve, (16) without reserve, (a) withhold restraint; frankly; freely, (b) (of articles at auction) without limitation as to the terms of sale: *esp. with no stipulated minimum price*, - adj. (17) kept in reserve; forming a reserve fund; a reserve supply, (18) of or pertaining to the animal awarded second place in live stock show: the reserve champion steer". The military (mil) definition comes closest but again, I fail to see how the Military could use civilians as a fighting force in combat.

At the end of World War II the United States stockpiled large quantities of raw materials (as Strategic War Reserves). With the advent of the Cold War, Nuclear Weapons, and the theory of Mutually Assured Destruction (MAD) where the war would last minutes if not days as opposed to years (World Wars I and II), these stockpiles became obsolete and were sold to commercial enterprises. The only Strategic Reserve of Material is the National Petroleum Reserve and there is continuing debate as to the value of this stock of oil (which is not the intent of this petition).

### SUMMARY

In reading Mr. Gordon's petition for partial reconsideration of WT 05-235, I find a lot of wishful thinking to justify the reinstatement of the Morse code requirement for

the Amateur Extra Class of operator's license. It is all a lot of "smoke" (National Security Interests) and "mirrors" (analogies and examples with no supporting relevance). After reviewing 1 **184** pages of Publications for Joint War Fighting Doctrine, there were 'ZERO' references to communications by Morse code or the use of Amateur Radio Operators in support of military planning for the War on Terrorism. An additional **403** pages of subordinate publications for Joint Operations for Interagency Coordination netted the same results for Morse code or Amateur Radio Operators. Similarly, a review of the National Incident Management System: An Introduction (IS-700) and National Response Plan: An Introduction (IS-800) leads to the same conclusion – there is no documented requirement for Radio Operator to show proficiency in Morse code. This is just another re-hashing of the tired old justifications put forth during the original comment periods, (now under the "mantra" of '**grave National Security implications**') to retain a part, if not the whole, of Morse code for examination purposes. As previously discussed, the only similar scenario this author is aware of is from the **Science Fiction movie 'Independence Day'**.

By Mr. Gordon's own words in footnote 14, page **6**, of his petition for partial reconsideration, "it is extremely doubtful that Morse Code telegraphy training is available today as a military occupation specialty in any of the U.S. Armed Forces...", it is apparent to him that the military has moved away from communications by Morse Code, in lieu of much faster and more reliable forms of communications (i.e., satellite, spread spectrum, internet (DoD Global Information Grid), etc.). **If**, as Mr. Gordon asserts in his request for partial reconsideration, the requirement for communications by Morse code is so vital to the National Security of the **U.S.**, why did the Departments of Defense and

Homeland Security fail to intercede during the comment periods of the RM and NPRM? The fact of the matter is, the US Navy has merged the Radioman and Signalmen ratings into the Information Technology Specialist rating and has not taught Morse code for a number of years. The Radioman School house was closed in the early 1990's, and Morse code is no longer taught.

Should the War on Terrorism come to shores of the United States, the President would in all likelihood shutdown the Amateur Radio Service (under the appropriate section of FCC rules, Part 97), just as was done in **1942**, at the start of World War II. At this point it would not matter if an Amateur Extra Class operator (or any other Amateur Radio Operator for that matter) was proficient in Morse code, no matter at what speed they could send and receive Morse code.

Does Mr. Gordon envision that the **U.S** Military would federalize the amateur radio operators, drafting them into uniform and 'under arms', to help in the War on Terrorism? I think not.

Strategic Reserves (or Strategic War Reserves) was a concept of stored precious minerals or metals which were not abundant within the Continental United States and would have to be imported from foreign countries. The problems associated with importing from foreign countries was the long time required for ships to transit vast ocean distances which could be controlled by submarines or surface ships. With the advent of intercontinental ballistic missiles which could deliver a Nuclear weapon over 5000 miles, the issue of controlling the shipping lanes became obsolete, along with the problem of time and distance for shipping precious commodities.

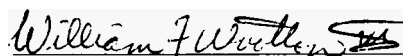
In his petition for partial reconsideration, Mr. Gordon fails to propose a solution to the question of what happens to the Amateur Radio Operators who have successfully tested for and been granted Amateur Extra Class licenses since the R&O became effective on February 23, 2007. To change the requirements at this late date, after a large number of applicants (ARRL VEC has reported a 100% increase in the number of testing sessions in the first month after the R&O became effective) have been granted licenses under the new rules, would throw the licensing system into total disarray. This would cause confusion on both the Amateur Radio Operators and the FCC licensing branch and impose an unreasonable and unnecessary burden on the Commission and Amateur Radio Operators. The cost of postage to recall all the Amateur Extra Class licensees and the additional efforts of the Telecommunications Branch personnel who run the Amateur license data base would be significant and cannot be economically justified by the flimsy "National Security Implications" as detailed in this petition for partial reconsideration.

Pursuant to and extrapolating from Mr. Gordon's logic, the FCC would have to petition Congress to repeal 18 U.S.C. § 1385 and then force or petition the Department of Defense to change its doctrine with respect to domestic operations. This does not stand up to intellectual scrutiny.

I respectfully request that the Commission deny this petition for reconsideration of WT Docket 05-235.

April 17, 2007

Respectfully yours,



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## **Appendix A**

### **Endnotes**

#### Overarching Documents – Joint Warfare

[1] Joint Publication 1, ‘Joint Warfare’ [www.dtic.mil/doctrine/jel/new\\_pubs/jp1.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp1.pdf)

[2] Joint Publication 0-2, ‘Unified Action Armed Forces’ (UNAAF)  
[www.dtic.mil/doctrine/jel/new\\_pubs/jp0\\_2.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp0_2.pdf)

#### Operation Doctrine Planning Documents

[3] Joint Publication 1-0 ‘Personnel’ [www.dtic.mil/doctrine/jel/new\\_pubs/jp1\\_0.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp1_0.pdf)

[4] Joint Publication 2-0 ‘Intelligence’ [www.dtic.mil/doctrine/jel/new\\_pubs/jp2\\_0.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp2_0.pdf)

[5] Joint Publication 3-0 ‘Operations’ [www.dtic.mil/doctrine/jel/new\\_pubs/jp3\\_0.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp3_0.pdf)

[6] Joint Publication 4-0 ‘Logistics’ [www.dtic.mil/doctrine/jel/new\\_pubs/jp4\\_0.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp4_0.pdf)

[7] Joint Publication 5-0 ‘Plans’ [www.dtic.mil/doctrine/jel/new\\_pubs/jp5\\_0.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp5_0.pdf)

[8] Joint Publication 6-0 ‘C4 Systems’ [www.dtic.mil/doctrine/jel/new\\_pubs/jp6\\_0.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp6_0.pdf)

(Note: C4 refers to Command, Control, Communications, & Computers)

#### Second Tier Documents under Joint Publication 3-0

[9] Joint Publication 3-08 ‘Interagency Coordination’ Volumes I & II  
[www.dtic.mil/doctrine/jel/new\\_pubs/jp3\\_08v1.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp3_08v1.pdf)  
[www.dtic.mil/doctrine/jel/new\\_pubs/jp3\\_08v2.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp3_08v2.pdf)

[10] Joint Publication 3-28 ‘Civil Support’ (currently under development)  
[www.dtic.mil/doctrine/jel/new\\_pubs/jp3\\_28.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp3_28.pdf)

[11] Joint Publication 3-29 ‘Humanitarian Operations’  
[www.dtic.mil/doctrine/jel/new\\_pubs/jp3\\_29.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp3_29.pdf)

[12] Joint Publication 3-57 ‘Civil-Military Operations’  
[www.dtic.mil/doctrine/jel/new\\_pubs/jp3\\_57.pdf](http://www.dtic.mil/doctrine/jel/new_pubs/jp3_57.pdf)

#### Federal Law

[13] 18 U.S.C. § 1385 -- Posse Comitatus Act

Department of Homeland Security (Federal Emergency Management Agency)

[14] National Incident Management System: An Introduction (IS-700)

<http://training.fema.gov/EMIweb/IS/is700.asp>

[15] National Response Plan: An Introduction (IS-800)

<http://training.fema.gov/EMIweb/IS/is800.asp>

[16] Introduction to Incident Command System (ICS- 100)

<http://training.fema.gov/EMIweb/IS/is100.asp>

[17] Basic Incident Command System (ICs-200)

<http://traininn.fema.gov/EMIweb/IS/is200.asp>

[18] Intermediate Incident Command System (ICs-300)

[www.agriculture.ark.edu/vetmed/transition/USDA\\_ics300/index.htm](http://www.agriculture.ark.edu/vetmed/transition/USDA_ics300/index.htm)

[19] Advanced Incident Command System (ICs-400)

[www.nimsonline.com/ics\\_training/index.htm](http://www.nimsonline.com/ics_training/index.htm)

Additional References

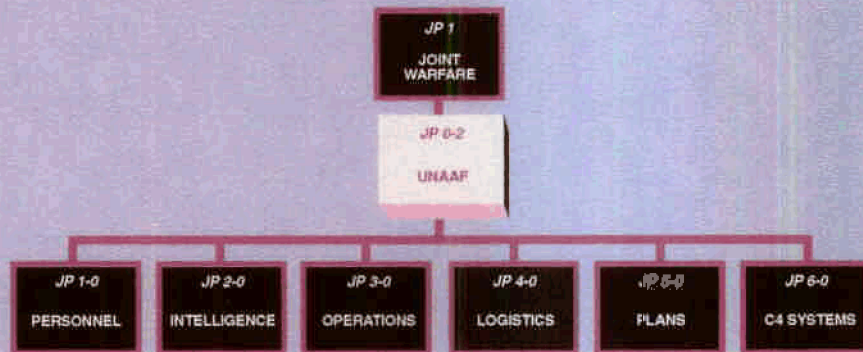
[20] Gary Hamel and C.K.Prahalad, ( 1990) "The Core Competence of the Corporation", *Harvard Business Review*, vol. 68, no. 3, May-June 1990, pp 79-93.

[21] General Carl Von Clausewitz, "ON WAR" published by N. Trubner, 1873 (A complete translation by Colonel J. J. Graham (Books I through VIII))

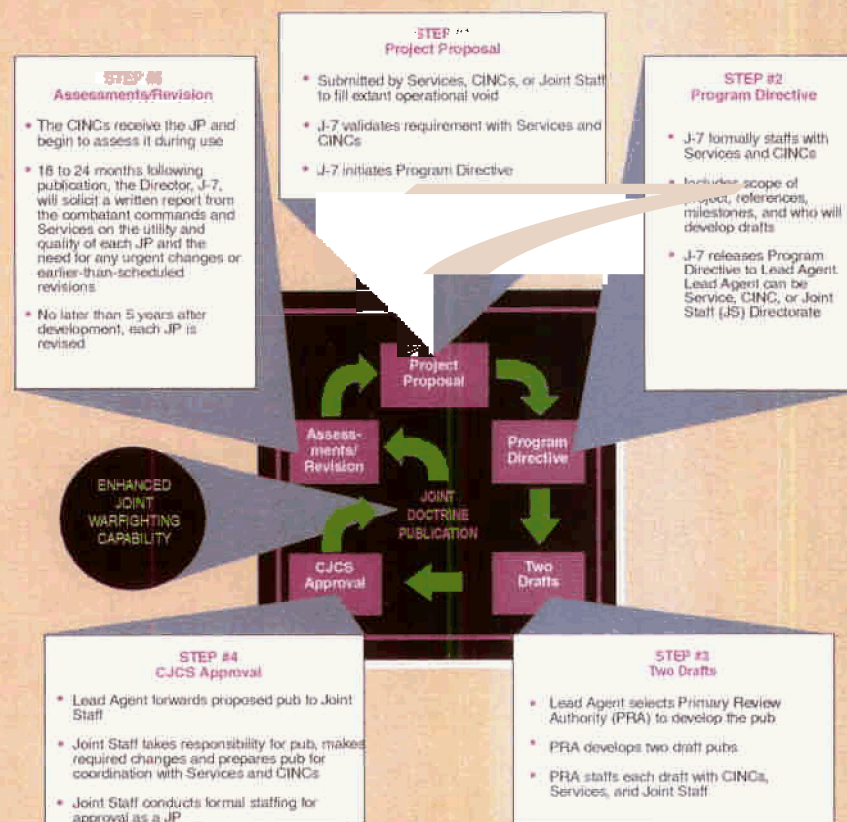
[22] Shorter Oxford English Dictionary, 5<sup>th</sup> Edition 2002, Volume 2, pages 2544 – 2545 and 3055.

[23] The Random House Dictionary of the English Language, 2<sup>nd</sup> Edition Unabridged, 1987, pages 1637 – 1638 and 1880

## JOINT DOCTRINE PUBLICATIONS HIERARCHY



All joint doctrine and tactics, techniques, and procedures are organized into a comprehensive hierarchy as shown in the chart above. Joint Publication (JP) 0-2 is in the capstone series of joint doctrine publications. The diagram below illustrates an overview of the development process:





# APPENDIX B

## JOINT PUBLICATION 3-0 SERIES HIERARCHY

### JOINT PUBLICATION 3-0 SERIES HIERARCHY

